



AQUILLA  
NUMMUS

# PRIVACY POLICY

2025

## **1. INTRODUCTION**

Aquila Nummus Ltd. is a Cyprus-based investment firm (CIF), which is licensed under the Cyprus Security and Exchange Commission (CySEC) for asset management services and in particular the management of investment portfolios, as well as ancillary services. The company is operating in the European Union and services international clients.

Aquila Nummus complies with the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and applicable Cypriot data protection law. This Policy sets out how we collect, use, store, and protect personal data.

The Board of Directors is responsible for implementing and reviewing this Policy, ensuring that the Company safeguards personal data while meeting its contractual, regulatory, and legal obligations, including AML/KYC requirements.

This Policy is reviewed annually or sooner if required by law or business needs.

## **2. PURPOSE**

The purpose of this Policy is to establish clear principles and procedures for the collection, processing, storage, and protection of personal data of clients and prospective clients.

## **3. SCOPE**

This Policy applies to:

- Individuals who are clients or prospective clients;
- Authorised representatives, officers, shareholders, or beneficial owners of such clients;
- Individuals who previously had a business relationship with the Company.

## **4. COLLECTION OF PERSONAL DATA**

We collect personal data directly from clients, prospective clients, their representatives, or from lawful third-party and public sources.

Data collected may include:

- Identification details (name, date of birth, nationality, ID/passport);
- Contact details (address, email, telephone);
- Tax and financial information (tax ID, residency, income, assets, liabilities);
- Professional information (employment, corporate roles, investment experience);
- Regulatory data (PEP status, AML/KYC checks, CRS/FATCA data);
- Records of communications, orders, and meetings.

Providing personal data is a legal and contractual requirement. Without it, we cannot establish or continue a business relationship or provide investment services.

## **5. USE OF PERSONAL DATA**

We process personal data for the following purposes:

- Contractual obligations: to establish and maintain business relationships and provide investment and ancillary services.
- Legal and regulatory compliance: to meet obligations under CySEC, AML/KYC laws, tax laws, and other applicable regulations.
- Legitimate interests: to protect our business, manage risk, ensure IT and system security, prevent fraud, and pursue or defend legal claims.
- Consent: for any additional processing not covered by the above grounds. Consent can be withdrawn at any time without affecting prior lawful processing.

## **6. RECIPIENTS OF PERSONAL DATA**

Personal data may be shared with:

- Regulatory and supervisory authorities (e.g. CySEC, Central Bank of Cyprus);
- Service providers and suppliers under confidentiality agreements;

- Custodians, depositories, and exchanges;
- External auditors, legal advisers, and consultants;
- IT, archiving, and records management providers.

Where transfers outside the EEA are required, appropriate safeguards under GDPR will be applied.

## 7. DATA RETENTION

- Personal data is retained for as long as a business relationship exists.
- After termination, data may be kept for up to ten (10) years to comply with legal and regulatory requirements or to defend legal claims.
- Retention may exceed ten years if required by law or legitimate business needs.
- Data of prospective clients is retained for six (6) months from the last contact, unless a longer period is legally justified.

## 8. DATA SUBJECT RIGHTS

You have the following rights under GDPR and Cypriot law:

- Access: obtain a copy of your data.
- Rectification: correct inaccurate or incomplete data.
- Erasure: request deletion where no legal ground for processing exists.
- Restriction: limit processing in certain cases.
- Objection: object to processing based on legitimate interests.
- Portability: request transfer of your data to you or a third party.
- Consent withdrawal: revoke consent at any time.
- Complaint: lodge a complaint with the Commissioner for Personal Data Protection.

To exercise your rights, contact us at [dpo@aquillanummus.com](mailto:dpo@aquillanummus.com) or +357 22777858.

## **9. REVIEW**

Aquila Nummus Ltd reserves the right to review and/or amend its Privacy Policy and arrangement whenever it deems this appropriate.

## **10. CONTACT**

Aquila Nummus

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